

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

FAIR ISAAC CORPORATION, a	)	
Delaware corporation,	)	
	)	
Plaintiff,	)	
	)	Case No. 16-cv-1054(WMW/DTS)
v.	)	
	)	
FEDERAL INSURANCE COMPANY, an	)	<b>Jury Trial Demanded</b>
Indiana corporation, and ACE	)	
AMERICAN INSURANCE COMPANY,	)	
a Pennsylvania corporation,	)	
	)	
Defendants.	)	
	)	

**PLAINTIFF FAIR ISAAC CORPORATION’S FOURTH SET OF REQUESTS  
FOR PRODUCTION OF DOCUMENTS TO DEFENDANTS  
FEDERAL INSURANCE COMPANY AND ACE AMERICAN INSURANCE COMPANY**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Plaintiff Fair Isaac Corporation (“FICO”) hereby requests that Defendants Federal Insurance Company (“Federal”) and ACE American Insurance Company (“ACE American”) produce the following documents and things requested below, in accordance with the Instructions and Definitions that follow. The requested documents and things must be produced at the offices of Merchant & Gould, 3200 IDS Center, 80 South 8th Street, Minneapolis, MN 55402, within thirty days of the date of service of these Requests, or at such other time and location as the parties may agree. If Federal and/or ACE American withholds from production any of the requested documents or things on any ground (for example, on a claim of attorney-client privilege or work-product immunity), FICO requests that Federal and/or ACE American provide, within thirty days of service of these Requests, a schedule identifying the withheld documents and things and the basis for the withholding.

**EXHIBIT 1**

These Requests are continuing, and responses thereto should be supplemented as required by the Federal Rules of Civil Procedure.

#### **INSTRUCTIONS AND DEFINITIONS**

The Instructions and Definitions from FICO's First Set of Requests for Production of Documents are incorporated by reference as if fully set forth herein. Additionally:

"Legacy ACE American broker and agent" means all brokers and agents credentialed to sell or renew insurance policies issued by any insurance company that was directly or indirectly owned by ACE Limited.

"Legacy Chubb broker or agent" means all brokers and agents credentialed to sell or renew insurance policies issued by any insurance company that was directly or indirectly owned by The Chubb Corporation.

"Legacy ACE American insurance policy product" means all insurance policies issued by any insurance company that was directly or indirectly owned by ACE Limited.

#### **REQUESTS FOR PRODUCTION**

**REQUEST NO. 79:** Documents sufficient to show the total number of insurance policies sold or renewed, specifically identifying the insurance company that issued each policy or renewal, in the United States in connection with which Blaze Advisor® software was used for the periods (a) calendar year 2015 and (b) January 16, 2016, to date, by quarter.

**REQUEST NO. 80:** Documents sufficient to show the total number of insurance policies sold or renewed, specifically identifying the insurance company that issued each policy or renewal, in Canada in connection with which Blaze Advisor® software was used for the periods (a) calendar year 2015 and (b) January 16, 2016, to date, by quarter.

**REQUEST NO. 81:** Documents sufficient to show the total number of insurance policies sold or renewed, specifically identifying the insurance company that issued each policy or renewal, in

the United Kingdom and Europe in connection with which Blaze Advisor® software was used for the periods (a) calendar year 2015 and (b) January 16, 2016, to date, by quarter.

**REQUEST NO. 82:** Documents sufficient to show the total number of insurance policies sold or renewed, specifically identifying the insurance company that issued each policy or renewal, in Australia in connection with which Blaze Advisor® software was used for the periods (a) calendar year 2015 and (b) January 16, 2016, to date, by quarter.

**REQUEST NO. 83:** Documents sufficient to identify (a) each legacy ACE American insurance policy product supported by an application or applications using Blaze Advisor® software, and (b) each legacy ACE American insurance policy product planned to be supported by an application or applications using Blaze Advisor® software.

**REQUEST NO. 84:** Documents sufficient to show the total number of insurance policies sold or renewed, specifically identifying the insurance company that issued each policy or renewal, by legacy ACE American brokers and agents in the United States in connection with which Blaze Advisor® software was used for the period January 16, 2016, to date, by quarter.

**REQUEST NO. 85:** Documents sufficient to show the total number of insurance policies sold or renewed, specifically identifying the insurance company that issued each policy or renewal, by legacy ACE American brokers and agents in Canada in connection with which Blaze Advisor® software was used for the period January 16, 2016, to date, by quarter.

**REQUEST NO. 86:** Documents sufficient to show the total number of insurance policies sold or renewed, specifically identifying the insurance company that issued each policy or renewal, by legacy ACE American brokers and agents in the United Kingdom and Europe in connection with which Blaze Advisor® software was used for the period January 16, 2016, to date, by quarter.

**REQUEST NO. 87:** Documents sufficient to show the total number of insurance policies sold or renewed, specifically identifying the insurance company that issued each policy or renewal, by legacy ACE American brokers and agents in Australia in connection with which Blaze Advisor® software was used for the period January 16, 2016, to date, by quarter.

**REQUEST NO. 88:** Documents sufficient to show the total number of insurance policies sold or renewed by legacy Chubb brokers and agents that issued from an insurance company formerly directly or indirectly owned by ACE Limited in connection with which Blaze Advisor® software was used for the period January 16, 2016, to date, by quarter.

**REQUEST NO. 89:** Specific to each application that uses or used Blaze Advisor® software, documents sufficient to show (a) the number of business rules in each application; (b) the type of business rules in each application, including, without limitation, underwriting, pricing, claims, renewal processing, and workflow, and (c) the number of daily and monthly batch and real-time business rule transactions for each application.

**REQUEST NO. 90:** Specific to each application that uses or used Blaze Advisor® software, all documents relating to the business rules of each application.

Dated: December 28, 2019

MERCHANT & GOULD P.C.

/s/ Heather Kliebenstein

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 28, 2018, a copy of the foregoing was emailed to the following attorneys of record:

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December 28, 2018

s/Abigail Krueger  
Abigail Krueger